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California State University*

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

**EDWIN HAMID NAHAVANDI,**  
Pla.  
**v.**  
**BOARD OF TRUSTEES OF THE**  
**CALIFORNIA STATE**  
**UNIVERSITY.**

2:24-cv-03791-RGK-MRWx

**DISCOVERY MATTER:  
DEFENDANT'S REVISED  
NOTICE OF MOTION FOR  
SANCTIONS**

Date: March 28, 2025  
Time: 9:30 a.m.  
Courtroom: 750  
Judge: Magistrate Judge Charles F. Eick

Discovery Cutoff: April 11, 2025  
Pretrial Conference: June 23, 2025  
Trial Date: July 8, 2025  
Action Filed: May 7, 2024

1 PLEASE TAKE NOTICE that Defendant Board of Trustees of the California  
2 State University (CSU) files the instant *Revised* Notice of Motion for Sanctions to  
3 correct an error regarding the judicial assignment. On February 25, 2025, CSU  
4 filed and served its Notice of Motion for Sanctions and accompanying documents.  
5 ECF 79. CSU's Motion was noticed for March 28, 2025, at 9:30 a.m., or as soon  
6 thereafter as the matter may be heard before Magistrate Judge Charles F. Eick at the  
7 Roybal Federal Building and U.S. Courthouse, located at 255 East Temple Street,  
8 Los Angeles, California 90012, Courtroom 750, 7th Floor. ECF 79.

9 At the time of filing, CSU inadvertently selected the incorrect judge, resulting  
10 in a notice that the matter would be assigned to the Honorable R. Gary Klausner:

11 **NOTICE OF MOTION AND MOTION for Sanctions Plaintiff Edwin Hamid Nahavandi**  
12 **filed by defendant Board of Trustees of The California State University. Motion set**  
**for hearing on 3/28/2025 at 09:30 AM before Judge R. Gary Klausner.**  
13 **(Attachments: # (1) Declaration of Cristina M. Matsushima ISO Defendant's Motion**  
**for Sanctions and re Plaintiff's Failure to Sign Joint Stipulation, # (2) Local Rule 37**  
**Joint Stipulation ISO Defendant's Motion for Terminating Sactions and Monetary**  
14 **Sanctions or, in the Alternative, Evidentiary Sanctions, # (3) Proposed Order**  
15 **Granting Defendant's Motion for Sanctions)(Matsushima, Cristina)**

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17 However, as stated in the Notice of Motion (ECF 79), this matter will be heard  
18 before **Magistrate Judge Charles F. Eick**. CSU's Notice of Motion and  
19 accompanying documents remain unchanged.

20 Dated: February 26, 2025

21 Respectfully submitted,

22 ROB BONTA  
23 Attorney General of California  
24 BENJAMIN G. DIEHL  
25 Supervising Deputy Attorney

26 /s/ Cristina M. Matsushima

27 CRISTINA M. MATSUSHIMA  
28 Deputy Attorneys General  
Attorneys for Defendant

## CERTIFICATE OF SERVICE

Case Name: **Nahavandi v. Board of Trustees of the CSU**

No. **2:24-cv-03791 RGK(Ex)**

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I hereby certify that on February 26, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

### **DEFENDANT'S REVISED NOTICE OF MOTION FOR SANCTIONS**

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

I further certify that some of the participants in the case are not registered CM/ECF users. On February 26, 2025, I have caused to be mailed in the Office of the Attorney General's internal mail system, the foregoing document(s) by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within three (3) calendar days to the following non-CM/ECF participants:

Edwin Nahavandi  
5710 Comanche Ave.  
Woodland Hills, CA. 91367  
[edwin.nahovandi@gmail.com](mailto:edwin.nahovandi@gmail.com)

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 26, 2025, at Los Angeles, California.

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Cecilia Apodaca  
Declarant

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/s/ Cecilia Apodaca  
Signature